

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	No. 4:17-cv-2455
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

DECLARATION OF DILLAN NEWBOLD

I, Dillan Newbold, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. On September 17, 2017, I was in the area of Washington Avenue and Tucker Boulevard in St. Louis, Missouri, with approximately one hundred other civilians and peaceful protesters.
3. The protests were related to the public outrage over the acquittal of Jason Stockley, a former St. Louis police officer who shot and killed Anthony Smith in 2011.
4. Without any warning, the group of peaceful protesters and civilians, of which I was a part, was surrounded by police in riot gear.

EXHIBIT S

5. During the entire time I was at the intersection of Washington Avenue and Tucker Boulevard, I never once heard the police issue a warning to protesters or order anyone to disperse.

6. After we were surrounded, it became clear that the intent of the police was to gather everyone in the area in a single spot and to surround us. After we were surrounded by the police, they began to move inward on us.

7. After we were surrounded and corralled into a small area, I complied with the police commands to get down.

8. I took out my phone and started to record the police after the police surrounded us and forced us into a small area.

9. I was sprayed with a chemical irritant that soaked my face, eyes, and throat. I was sprayed at point blank range. I was sprayed despite being unarmed, compliant, and not resisting the police.

10. I believe I was sprayed with chemical irritant because I was recording the police.

11. Before I was sprayed with chemical irritant, an officer jabbed a can of the pepper spray in my face and said, "put the damn phone away."

12. While surrounded by police and not able to leave, despite complying with their commands, I was restrained with my hands behind my back in such a manner that I lost circulation.

13. My hands were restrained for over an hour causing nerve damage, pain, and dysfunction.

14. I expressed concern to several officers about nerve damage and asked them to rebind my hands so the restraints were not so tight; I was repeatedly ignored and none of the officers loosened the restraints.

15. I was also hit in the head and dragged across the pavement.

16. Other people around me, including those who attempted to record the events as they unfolded, received similar treatment by the police.

17. I was wearing swimming goggles to protect my eyes and a bandana when I was first sprayed by the police with the chemical irritant. An officer then ripped off my goggles, pulled down my bandana, and dragged me into the street. As this was happening, another officer sprayed a thick coat of chemical irritant onto my now exposed face.

18. I held my eyes shut and screamed because of the burning pain piercing my face and neck.

19. It was at this time that my hands were restrained behind my back. My restraints were so tight that I lost blood circulation to my hands.

20. The police stood over me and mocked me while I was in pain. One officer told me, "I'm so glad I'm in St. Louis and get to do shit like this!"


21. I was told by officers that I deserved the pain I was in.

22. I was taken to jail and detained for over fifteen hours.

23. I never broke any law and I complied with all of the police commands.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 27th day of September, 2017.

By: 
Dillan Newbold